



Jb Beckley

7:18 AM, Aug 15



(No subject)

Good morning- Please send me a list of the employees who came with you are working on Monday 8/19. I would like to begin scheduling meetings with the 11 individuals over the next week or so.

I would also like to speak with your wife about pursuing an unpaid wage claim in federal court.

Time to push back hard. Provided all (or most) employees testify that you did not solicit or promise them anything to come with you, we are going to be in good shape.

On attorney's fees— I have a proposition for you. If you look back at our texts, I estimated that you will end up in the 30k to 50k range for fees by the time this case is finished. On the new Jeep, I am looking at a balance of approximately 38k with the AEV trade-in. If you want, I am willing to flat rate the entire defense of the lawsuit for the balance of the Jeep. This means that you are 100% paid on fees.

The only out-of-pocket money on your end would be litigation costs, which we will

4:11

🔔 🔊 🔋 94%

< Jb Beckley

7:18 AM, Aug 15

⋮

(No subject)

Jeep. This means that you are 100% paid on fees.

The only out-of-pocket money on your end would be litigation costs, which we will keep to a minimum. Costs are things like transcripts, court reporter fees, etc.

Let me know if this works for you.

On your wife's claim, we may end up dismissing it to leverage a settlement. If we can make the flat rate work, I will have her sign a contingency agreement that does not require any out-of-pocket fees or costs for that lawsuit. The law allows me to seek fees and costs from the company on that claim, so if it went that far (which is doubtful) I would ask the Court to make them pay. Any unpaid wages we recover would go straight to your wife. Either way— no out-of-pocket from your end.

Looking for a win-win arrangement that provides certainty for both of us; i.e. you won't be running up big legal bills defending this case and I am paid in full.